



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107-4431

100457

HAND DELIVERED

October 18, 1993

Anne Hiller
DNREC
715 Grantham Lane
New Castle, DE 19720

Re: Draft Feasibility Study Addendum for Standard Chlorine of Delaware

Dear Ms. Hiller:

EPA has reviewed the Draft Feasibility Study Addendum dated September 1993 for the Standard Chlorine of Delaware Site. Although EPA identified technical deficiencies in the report, it does contain adequate information to select a preferred alternative. In turn, as stated in EPA's letter dated October 12, 1993, EPA recommends that DNREC approve this report with the observation that a number of deficiencies were identified and that the review memos/letters will be placed in the administrative record.

EPA's comments on the above referenced report are attached to this letter. The comments include EPA and EPA's oversight contractor. In addition, I have enclosed EPA's review comments on the Treatability Study conducted by Kerr Environmental Research Laboratory.

As always, if you have any questions, I can be reached at (215) 597-0910.

Sincerely,

Katherine A. Lose
Remedial Project Manager
DE/MD Section

Enclosures

cc: B. Pasquini, EPA (w/o enclos)
B. Davis, EPA (w/o enclos)
D. Ioven, EPA (w/o enclos)
D. Spencer, Versar

AR308383

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

SUBJECT: Standard Chlorine
Review of FS Addendum

DATE: 10-18-93

FROM: Kate Lose (3HW42) *KL*
DE/MD Section

TO: Anne Hiller
DNREC

I have reviewed the Draft Feasibility Study Addendum for Standard Chlorine of Delaware, Inc., dated September 1993. I had anticipated that the addendum would only address and expand on Alternative 5 and was somewhat surprised by the impact of this addendum on the other alternatives. My comments are as follows:

General

The incorporation on insitu bioremediation for the sediments in the unnamed tributary and Red Lion Creek into Alternative 3 and 4A is a significant change. Based on the review of the Treatability Study, and EPA's experience with in-situ field work, the feasibility of using insitu bioremediation for these sediments will require additional testing.

Overall, the results of the treatability study are inconclusive and EPA does not agree with the findings or the conclusions found on page 2-1 of the Draft Feasibility Study Addendum. Comments from Kerr Research Laboratory provide more specific comments on the data presented in the Treatability Study.

Specific Comments:

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ES-6

2nd Bullet - The purpose of this comment is to state EPA's understanding of the proposed alternatives. It is EPA's understanding that Alternative 4A proposes the use of thermal treatment for all excavated soils/sediments, except for those sediments which are difficult to access along the unnamed tributary and Red Lion Creek. Under Alternative 4A, the sediments which are difficult to access as delineated above, SCD is proposing In situ bioremediation. Under Alternative 4B, all contaminated soils/sediments will undergo thermal treatment.

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